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as Petitioner and Foreign Representative*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ARALCO S.A. - Indústria e Comércio, *et al.*,

Debtors in Foreign Proceedings.

)
)
) Case No. 15-10419 (REG)
) (Jointly Administered)
)
) Chapter 15
)

**CERTIFICATE OF NO OBJECTIONS TO FOREIGN REPRESENTATIVE'S
PETITION FOR RECOGNITION OF BRAZILIAN BANKRUPTCY
PROCEEDINGS AND MOTION FOR ORDER GRANTING RELATED RELIEF
PURSUANT TO 11 U.S.C. §§ 105(a), 1507(a), 1509(b), 1515, 1517, 1520 AND 1521**

TO THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Rules of the United States
Bankruptcy Court for the Southern District of New York, and in accordance with this Court's
case management procedures set forth in the Order Pursuant to Federal Rules of Bankruptcy
Procedure 2002 (m) and (q) and 9007 Scheduling Hearing and Specifying Form and Manner of

Service of Notice [ECF No. 12] (the “Procedural Order”),¹ the undersigned hereby certifies as follows:

1. On February 25, 2015 (the “Petition Date”), Ricardo Costa Villela (the “Petitioner”), in his capacity as Foreign Representative in respect of the Brazilian Bankruptcy Proceedings, filed *Foreign Representative’s Petition for Recognition of Brazilian Bankruptcy Proceedings and Motion for Order Granting Related Relief Pursuant To 11 U.S.C. §§ 105(a), 1507(a), 1509(b), 1515, 1517, 1520 And 1521* [ECF No. 3] (together with the Forms of Voluntary Petition [ECF No. 1], the “Petition”).

2. Pursuant to the Procedural Order and in accordance with Federal Rule of Bankruptcy Procedure 2002(q)(1), on March 4, 2015, the Notice Documents (as defined in the Procedural Order) were served on, among others, counsel to the Debtors, the Office of the United States Trustee for the Southern District of New York, counsel to the Ad Hoc Group, and the Indenture Trustee. See Affidavit of Service of Hannah E. Lee [ECF No. 13]; Affidavit of Service of Daniel Gold [ECF No. 14]. Further, pursuant to the Procedural Order, on March 6, 2015, the Notice Documents were provided to the Indenture Trustee with instructions to forward the Notice Documents on behalf of the Petitioner to the DTC and to instruct the DTC to disseminate the Notice Documents to the Noteholders according to the DTC’s customary practices. See Affidavit of Daniel Gold [ECF No. 17]. Lastly, pursuant to the Procedural Order, on March 6, 2015, the court-approved notice of the Recognition Hearing was published in the Wall Street Journal (National Edition). See Affidavit of Publication of Vinod Srinivasan [ECF No. 16].

¹ Except as otherwise indicated, capitalized terms used herein carry the meanings ascribed to them in the Petition.

3. The deadline to object to the Petition passed on April 8, 2014 at 4:00 pm (the “Objection Deadline”), and, to the best of my knowledge, no objection or other responsive pleading to the Motion or request for hearing has been (a) filed with the Court on the docket of the above-referenced case in accordance with the procedures set forth in the Case Management Order or (b) served on (or received by) the Petitioner or his counsel.

4. This certification is being made and filed more than 48 hours after the Objection Deadline.

5. Accordingly, the Petitioner respectfully requests that the Court enter a final order, substantially in the form attached hereto as Exhibit A, granting recognition of the Brazilian Bankruptcy Proceedings as foreign main proceedings and granting the other Requested Relief. For the Court’s convenience, attached hereto as Exhibit B is a comparison of the proposed final order attached hereto as Exhibit A against the proposed form of order submitted to the Court on February 25, 2015.

Dated: New York, New York

April 20, 2014

WHITE & CASE LLP

By: /s/ John K. Cunningham
John K. Cunningham
Richard S. Kebrdle

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